IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

RICKY MATLOCK and)	
BRIDGET MATLOCK,)	
Plaintiffs,)	Case No.: 3:18-cv-00047
v.))	Judge William L. Campbell, Jr. Magistrate Alistair Newbern
ROUNDPOINT MORTGAGE SERVICING)	0
CORPORATION; EMBRACE HOME)	
LOANS, INC.; and LOANCARE, LLC)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DEADLINE FOR CONDUCTING FACT DISCOVERY AND FILING DISCOVERY MOTIONS

COME NOW, all parties to this action consisting of Plaintiffs Ricky Matlock and Bridget Matlock ("Plaintiffs") Defendants RoundPoint Mortgage Servicing Corporation ("RoundPoint"), Embrace Home Loans, Inc. ("Embrace"), and LoanCare, LLC ("LoanCare") (collectively, the "Parties") and jointly file this motion to extend the deadline to complete factual discovery from April 26, 2019 to **June 21, 2019** and the deadline to file discovery motions from May 3, 2019 to **June 7, 2019**. In support thereof, the Parties state as follows:

- 1. This motion is jointly being filed by the Parties so there is no disagreement or objection with respect to the proposed relief.
- 2. The request is necessary to give the Parties an adequate opportunity to complete factual discovery.
- 3. With respect to factual discovery, the Parties have already exchanged documents and written discovery responses. The Parties have also scheduled the parties' 343848.1

respective depositions including depositions of the Plaintiffs tentatively scheduled to be conducted on May 13, 2019, deposition of the corporate representative of RoundPoint and Embrace to be conducted on May 16, 2019, and deposition of the corporate representative of LoanCare to be conducted on May 21, 2019. The Parties believe that they will be able to complete remaining factual depositions, if any, by the proposed new factual discovery deadline of June 21, 2019.

- 4. The proposed continuance addresses the concerns discussed during the discovery conference with the Court on April 8, 2019.
- 5. The proposed extension will not delay the proceeding including, but not limited to, the summary judgment deadlines and/or the trial date.
- 6. The requested extension will conform to the requirements of Local Rule 16.01(d)(2.f).
- 7. A proposed, revised case management order setting forth the new proposed deadline and all prior, unaffected deadlines has been attached as Exhibit A and has been approved in full for entry by the Parties.

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ENTERED This 26th day of April, 2019.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been forwarded to the following, by regular U.S. Mail or email where appropriate, on this 26th day of April, 2019:

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